



Krista Merritt <kmerritt@acb.org> on 02/01/2002 04:57:47 PM

To: vss@FBC  
cc:

Subject: Comments re: Draft Voting System Standards

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Please find enclosed in the attachment, ACB comments on approved December 13, 2001: (DOC. ID: fr20de01-52.) submitted by the American Council of the Blind.

if you have any questions regarding this transmission, please contact

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# American Council of the Blind

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February 1, 2002

Ms. Penelope Bonsall, Director  
Office of Election Administration  
Federal Election Commission, 999 E. Street, NW  
Washington, DC 20463

Re: Draft Voting System Standards approved December 13, 2001: (DOC. ID: fr20de01-52)

Dear Ms. Bonsall,

The American Council of the Blind (ACB) is pleased to respond to the request of the Federal Election Commission for public comment on the Draft Voting System Standards approved at its December 13, 2001 meeting.

(ACB) is a national nonprofit, consumer organization of the blind, with seventy affiliates and members in all fifty states. Its mission is to improve the quality of life, equality of opportunity, and independence for all persons who are blind. To that end, ACB seeks to educate policy makers about the needs and capabilities of people who are blind. For the past several years, one of the policy areas that has been of primary concern to our organization is access to a secret, independent and verifiable ballot for all voters, including those who are blind or visually impaired. We have worked with elections officials at all levels of government to ensure increased access to this basic civil right for all who wish to exercise it. We are pleased that several states and municipalities across the country have taken steps in recent months to make their voting systems accessible to people with disabilities, but we still have a long way to go before all Americans will be able to cast a private and independent ballot.

Our comments pertaining to your proposed standards center around Section 2.2.7 of the draft standard. We are pleased that the Federal Election Commission included some accessibility standards which apply to all voting systems. However, we are disturbed to note that the only standards providing for accessibility to persons with sensory disabilities apply to DRE voting systems. This is of concern to us since, as you are probably aware, technology exists, and is being marketed, which allows optical scan systems to provide a touch screen interface that can be used by voters who require it in order to access the system. Many local elections officials are not aware of this option. It would be very

helpful to all parties working to increase the accessibility of election systems if the standards were to reflect that this is a viable option.

Additionally, Section 2.2.7.2 H. provides that systems which provides sound cues as a method to alert voters about certain conditions, such as errors, or confirmations, shall provide tones accompanied by visual cues for users who cannot hear. We support this provision, but would also point out that a tone alone will not provide users who cannot see with any information about what the tone is meant to signify.

If you require any further information about these matters, please contact Melanie Brunson, Director of Advocacy and Governmental Affairs at the address or telephone number provided above.

Thank you very much.

Respectfully submitted,

Melanie Brunson, Director of Advocacy and Governmental Affairs